



American Association of
State Highway and
Transportation Officials

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Wayne Muri, President
Chief Engineer
Missouri Highway
and Transportation
Department

Francis B. Francois
Executive Director

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July 23, 1993

FEDERAL COMMUNICATIONS COMMISSION
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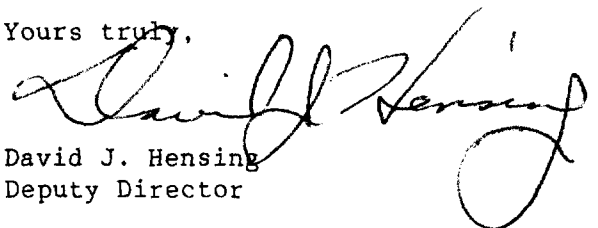
Office of the Secretary
Federal Communications Commission
1919 M Street, Room 239
Washington, D.C. 20554

Dear Sir or Madam:

Enclosed are an original and nine copies of AASHTO's comments concerning PR Docket 93-61 concerning Amendment of Part 90 of the Commission's Rules to Adopt Regulations for Automatic Vehicle Monitoring Systems.

Do not hesitate to so inform me should you have further comments or questions regarding this submittal.

Yours truly,


David J. Hensing
Deputy Director

DJH:LAM:abm

Enclosures

cc: Alan Hull
Jack Stanton

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OFFICE OF THE SECRETARY

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

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Amendment of Part 90 of the
Commission's Rules to Adopt
Regulations for Automatic
Vehicle Monitoring Systems

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PR Docket 93-61

Reply Comments of the
American Association of State Highway and Transportation Officials
Special Committee on Communications

Alan Hull, Chairman

JUL 23 1993

The American Association of State Highway and Transportation Officials (AASHTO) respectfully submits these Reply Comments in the Commission's Notice of Proposed Rulemaking in the above-captioned

AASHTO is the Federal Communications Commission (FCC) certified frequency coordinator of the highway maintenance radio service for frequencies below 512 MHz.

The use of two-way radio communications is an integral part of transportation and traffic management systems. The application of such communications systems to all phases of highway construction, maintenance, snow removal, ice control, as well as management of complex traffic control systems has greatly enhanced the efficient and safe movement of motorists and goods. The Intelligent Vehicle/Highway System (IVHS) Technologies which are currently being developed and implemented have the potential to greatly reduce traffic congestion and improve motorist safety.

The issue addressed by this proposal is whether the 902-928 MHz band can be shared by divergent systems (wideband vs. narrowband) or that exclusive allocation of frequencies is required.

AASHTO is a member of the Intelligent Vehicle-Highway Society (IVHS) of America and supports the comments of IVHS-America in this proceeding.

The California Department of Transportation (Caltrans), an AASHTO member has also filed comments regarding the importance of Automatic Traffic Management Systems and the attendant requirement

for radio frequency spectrum. AASHTO agrees with Caltrans that

current and future technologies will make valuable Automatic Traffic Management Systems (ATMS) and other IVHS related systems available.

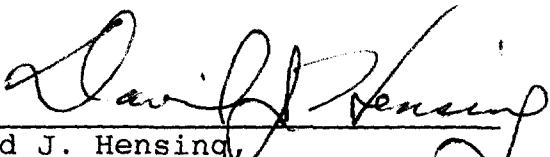
The Commission's rules have always promoted and encouraged the sharing of frequencies where possible. That policy should be continued with respect to the 902-928 MHz band. If the band is divided into separate "exclusive use" segments, then the segments should be contiguous. The entire band should be made available to all users with "secondary non-interfering status" given to out of band operations. An example, would be for a narrowband system operating in the edge of the wide band frequency segment. The operation would be permitted provided it did not interfere with the wide band systems.

Summary

AASHTO respectfully requests that the Commission consider the impact of IVHS and related systems upon the operation of a safe and

efficient national transportation systems and ensure that sufficient frequencies be made available for the operation of that system.

Respectfully submitted,
American Association of State
Highway and Transportation
Officials, Special Committee on
Communications

By: 
David J. Hensing,
Deputy Director, American
Association of State Highway
and Transportation Officials